

EXHIBIT 37

DEA Compliance Procedure	No:
Subject:	Revision No.:
Controlled Substance Suspicious Order Monitoring	Draft 2 published 05/13/08
	Effective Date:
	Supersedes Date:
	NEW
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PURPOSE:

Establish a procedure to identify and report controlled substance suspicious orders to the Drug Enforcement Administration

SCOPE:

Applies to establishing a new controlled substance customer account and subsequent shipment of all controlled substance orders to new or established customers.

REFERENCES:

Title 21 CFR 1301.74(b)

The registrant shall design and operate a system to disclose to the registrant suspicious orders of controlled substances. The registrant shall inform the Field Division Office of the Administration in his area of suspicious orders when discovered by the registrant. Suspicious orders include orders of unusual size, orders deviating substantially from a normal pattern, and orders of unusual frequency..

DEFINITIONS:

Peculiar Order	A controlled substance order that meets an internal, established criteria that will be placed on hold pending further review by DEA Compliance.
Suspicious Order	A Peculiar Order that has been reviewed by DEA Compliance and Security that will not be shipped and will be reported to the Drug Enforcement Administration.

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RESPONSIBILITIES:

Credit Department or Customer Data Integrity Group

Performs Dun & Bradstreet and/or other information checks on new controlled substance customers to determine credit worthiness.

Refers the new customer account to Security Director or DEA Compliance if the new account has no historical or financial information available or if the data shows liens, lawsuits, or other information which might raise suspicions as to the legitimacy of the new account company.

Conducts periodic checks for existing accounts. Notifies Security Director or DEA Compliance of any customer credit concerns.

Field Sales

Completes Site Survey Checklist for New Controlled Substance Customers (Attachment A)

Customer Service Representatives

Bulk Narcotics Customer Service Representatives will perform the following activities for each order entered:

Verify that the customer has a valid DEA Registration certificate

Assure that the customer has provided a DEA 222 form for CI and CII substances

Obtain a "Certificate of Available Procurement Quota" from customers using a Manufacturing Registration DEA 222 Form

Obtain a "Statement of Intended Use" from customers using a Research or Analytical Lab Registration DEA 222 Form

Forward the "Statement of Intended Use" to DEA Compliance for review

Designate an order as "Peculiar" if the customer fails to provide the appropriate documentation above.

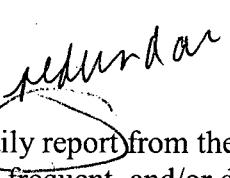
Forward Peculiar Order information to Customer Service Manager and Security Director

Dosage Customer Service Representatives will _____

Customer Service Manager

Obtains a Peculiar Order Daily Report daily report from the order entry system that highlights orders that are unusually large, unusually frequent, and/or deviating in quantity from an established order pattern.

Annotate the Peculiar Order Report if there is a valid business reason for an order of unusually large, unusually frequent, and/or deviating in quantity from an established order pattern.

Forward the Peculiar Order Report to Security Manager/DEA Compliance. 

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For Bulk Narcotics, an order will be deemed to be Peculiar if the order quantity is double the amount of product ordered during the previous fiscal year and YTD average by sku, by customer.

For Dosage Narcotics, an order will be deemed to be Peculiar if the order quantity is

Security Director and DEA Compliance

Provides blank Site Survey Checklist forms for New Controlled Substance Customers to be completed by Field Sales

Reviews results of Site Survey Checklist for New Controlled Substance Customers and provides authorization to proceed with new customer account set-up

Determines if Peculiar Orders are to be shipped or designated as Suspicious Orders and not shipped based upon information received from the Credit Department, Customer Service, Field Sales, and DEA Webpage "Drugs of Concern Listing".

Maintains a file for record retention of Suspicious Order Monitoring documents and reports.

Conducts training on the Controlled Substance Suspicious Order Monitoring Procedure for Credit Department, Field Sales, and Customer Service.